

PLAINTIFFS' EXHIBIT A

Plaintiffs' Declarations Regarding Venue for Class Action

In The Case Of

Heather McDonald, et al,

v.

Emmanuel Dapidran Pacquiao, et al

3:15-cv-01006-JLS-BGS

1 **KAZEROUNI LAW GROUP, APC**

2 Abbas Kazerounian, Esq. (249203)
3 ak@kazlg.com
4 245 Fischer Avenue, Unit D1
5 Costa Mesa, CA 92626
6 Telephone: (800) 400-6808
7 Facsimile: (800) 520-5523

8 **HYDE & SWIGART**

9 Joshua B. Swigart, Esq. (225557)
10 josh@westcoastlitigation.com
11 2221 Camino Del Rio South, Suite 101
12 San Diego, CA 92108
13 Telephone: (619) 233-7770
14 Facsimile: (619) 297-1022

15 *Attorneys for Plaintiffs,*
16 Heather McDonald, et al.

17 **RKR LEGAL, APC**

18 Sina Rezvanpour, Esq. (274769)
19 sr@rkrlegal.com
20 Seyed Kazerouni, Esq. (272148)
21 mk@rkrlegal.com
22 245 Fischer Ave, Suite D1
23 Costa Mesa, California 92626
24 Telephone: (866) 502-0787
25 Facsimile: (866) 502-5065

26 **UNITED STATES DISTRICT COURT**
27 **SOUTHERN DISTRICT OF CALIFORNIA**

28 **HEATHER MCDONALD,
29 PAYMAN SHAHIN, ANGELA
30 THILL, GARY REMPEL, WENDY
31 MELLINE, INDIVIDUALLY AND
32 ON BEHALF OF ALL OTHERS
33 SIMILARLY SITUATED,**

34 Case No.:

35 **Declaration of Heather McDonald in
36 Support of Venue for Class Action
37 Complaint Pursuant to Civil Code
38 Section 1780(c)**

39 Plaintiffs,

40 v.

41 **EMMANUEL DAPIDRAN
42 PACQUIAO; TOP RANK, INC.,**

43 Defendants.

1 I Heather McDonald, declare under penalty of perjury as follows:

2 1. I make this declaration based upon my personal knowledge except as to those
3 matters stated herein that are based upon information and belief, which I
4 believe to be true. I am over the age of eighteen, a citizen of the State of
5 California, and am a named Plaintiff in the litigation described in the caption
6 page of this declaration.

7 2. This declaration is made pursuant to California Civil Code section 1780(c).

8 3. I reside in San Diego, California which is in the County of San Diego.

9 4. The complaint filed concurrently with this declaration contains a cause of
10 action for violation of the Consumer Legal Remedies Act against the above
11 named Defendants which advertise, and sell the pay-per-view services at
12 issue in the complaint.

13 5. I purchased the pay-per-view for the Mayweather vs. Pacquiao fight (the
14 "Bout") on May 2, 2015, while located in San Diego, California, which is in
15 the Southern District of California, on or about May 2, 2015. The Bout
16 pay- per-view I purchased is at issue in this complaint in this matter.

17 6. The transaction described above form a substantial portion of this action, and
18 occurred in the Southern District of California and the County of San Diego.
19 To the best of my knowledge, based upon information and belief, Defendants
20 do business in the Southern District of California and San Diego County,
21 California, and advertise and markets their products, including the products at
22 issue in this complaint, in the Southern District of California and San Diego
23 County California. Accordingly, this judicial district is a proper place for
24 trial of this action.

25 ///

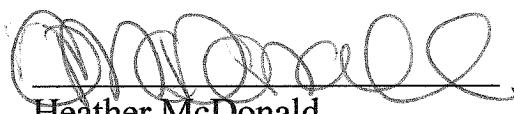
26 ///

27 ///

1 I declare under penalty of perjury under the laws of California and the
2 United States of America that the foregoing is true and correct.
3
4

5 Executed this day of May 11, 2015 in San Diego, California.
6
7
8

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



Heather McDonald

KAZEROONI LAW GROUP, APC
245 FISCHER AVENUE, UNIT D1
COSTA MESA, CA 92626

1 **KAZEROUNI LAW GROUP, APC**

2 Abbas Kazerounian, Esq. (249203)
3 ak@kazlg.com
4 245 Fischer Avenue, Unit D1
5 Costa Mesa, CA 92626
6 Telephone: (800) 400-6808
7 Facsimile: (800) 520-5523

1 **RKR LEGAL, APC**

2 Sina Rezvanpour, Esq. (274769)
3 sr@rkrlegal.com
4 Seyed Kazerouni, Esq. (272148)
5 mk@rkrlegal.com
6 245 Fischer Ave, Suite D1
7 Costa Mesa, California 92626
8 Telephone: (866) 502-0787
9 Facsimile: (866) 502-5065

10 **HYDE & SWIGART**

11 Joshua B. Swigart, Esq. (225557)
12 josh@westcoastlitigation.com
13 2221 Camino Del Rio South, Suite 101
14 San Diego, CA 92108
15 Telephone: (619) 233-7770
16 Facsimile: (619) 297-1022

17 *Attorneys for Plaintiffs,*
18 Heather McDonald, et al.

19 **UNITED STATES DISTRICT COURT**
20 **SOUTHERN DISTRICT OF CALIFORNIA**

21 **HEATHER MCDONALD,
22 PAYMAN SHAHIN, ANGELA
23 THILL, GARY REMPEL, WENDY
24 MELLINE INDIVIDUALLY AND
25 ON BEHALF OF ALL OTHERS
26 SIMILARLY SITUATED,**

27 Case No.:

28 Declaration of Wendy Melline in
29 Support of Venue for Class Action
30 Complaint Pursuant to Civil Code
31 Section 1780(c)

32 Plaintiffs,

33 v.

34 **EMMANUEL DAPIDRAN
35 PACQUIAO; TOP RANK, INC.,**

36 Defendants.

1 I Wendy Melline, declare under penalty of perjury as follows:

2 1. I make this declaration based upon my personal knowledge except as to those
3 matters stated herein that are based upon information and belief, which I
4 believe to be true. I am over the age of eighteen, a citizen of the State of
5 California, and am a named Plaintiff in the litigation described in the caption
6 page of this declaration.

7 2. This declaration is made pursuant to California Civil Code section 1780(c).

8 3. I reside in Pinon Hills, California which is in the County of San Bernardino.

9 4. The complaint filed concurrently with this declaration contains a cause of
10 action for violation of the Consumer Legal Remedies Act against the above
11 named Defendants which advertise, and sell the pay-per-view services at
12 issue in the complaint.

13 5. I purchased the pay-per-view for the Mayweather vs. Pacquiao fight (the
14 “Bout”) on May 2, 2015, while located in Pinon Hills, California, which is in
15 the Central District of California, on or about May 2, 2015. The Bout pay-
16 per-view I purchased is at issue in this complaint in this matter.

17 6. The transaction described above form a substantial portion of this action, and
18 occurred in the Central District of California and the County of San
19 Bernardino. To the best of my knowledge, based upon information and
20 belief, Defendants do business in the Central District of California and San
21 Bernardino County, California, and advertise and markets their products,
22 including the products at issue in this complaint, in the Central District of
23 California and San Bernardino County California. Accordingly, this
24 judicial district is a proper place for trial of this action.

25 ///

26 ///

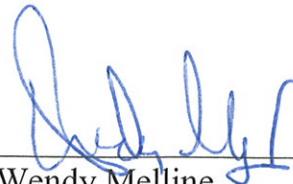
27 ///

1 I declare under penalty of perjury under the laws of California and the
2 United States of America that the foregoing is true and correct.

3
4 Executed this day of May 18, 2015 in Pinon Hills, California.

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Wendy Melline



KAZEROONI LAW GROUP, APC
245 FISCHER AVENUE, UNIT D1
COSTA MESA, CA 92626

KAZEROUNI LAW GROUP, APC
Abbas Kazerounian, Esq. (249203)
ak@kazlg.com
245 Fischer Avenue, Unit D1
Costa Mesa, CA 92626
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

RKR LEGAL, APC
Sina Rezvanpour, Esq. (274769)
sr@rkrlegal.com
Seyed Kazerouni, Esq. (272148)
mk@rkrlegal.com
245 Fischer Ave, Suite D1
Costa Mesa, California 92626
Telephone: (866) 502-0787
Facsimile: (866) 502-5065

HYDE & SWIGART
Joshua B. Swigart, Esq. (225557)
josh@westcoastlitigation.com
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108
Telephone: (619) 233-7770
Facsimile: (619) 297-1022

*Attorneys for Plaintiffs,
Heather McDonald, et al.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**HEATHER MCDONALD,
PAYMAN SHAHIN, ANGELA
THILL, GARY REMPEL, WENDY
MELLINE, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED.**

Case No.:

**Declaration of Gary Rempel in Support
of Venue for Class Action Complaint
Pursuant to Civil Code Section 1780(c)**

Plaintiffs.

V.

EMMANUEL DAPIDRAN PACQUIAO; TOP RANK, INC.,

Defendants.

1 I Gary Rempel, declare under penalty of perjury as follows:

2 1. I make this declaration based upon my personal knowledge except as to those
3 matters stated herein that are based upon information and belief, which I
4 believe to be true. I am over the age of eighteen, a citizen of the State of
5 California, and am a named Plaintiff in the litigation described in the caption
6 page of this declaration.

7 2. This declaration is made pursuant to California Civil Code section 1780(c).

8 3. I reside in Vista, California which is in the County of San Diego.

9 4. The complaint filed concurrently with this declaration contains a cause of
10 action for violation of the Consumer Legal Remedies Act against the above
11 named Defendants which advertise, and sell the pay-per-view services at
12 issue in the complaint.

13 5. I purchased the pay-per-view for the Mayweather vs. Pacquiao fight (the
14 “Bout”) on May 2, 2015, while located in Vista, California, which is in the
15 Southern District of California, on or about May 2, 2015. The Bout pay-
16 per-view I purchased is at issue in this complaint in this matter.

17 6. The transaction described above form a substantial portion of this action, and
18 occurred in the Southern District of California and the County of San Diego.
19 To the best of my knowledge, based upon information and belief, Defendants
20 do business in the Southern District of California and San Diego County,
21 California, and advertise and markets their products, including the products at
22 issue in this complaint, in the Southern District of California and San Diego
23 County California. Accordingly, this judicial district is a proper place for
24 trial of this action.

25 ///

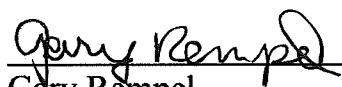
26 ///

27 ///

28

1 I declare under penalty of perjury under the laws of California and the
2 United States of America that the foregoing is true and correct.

3
4 Executed this day of May 13, 2015 in Vista, California.
5
6

7 
8 Gary Rempel
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KAZEROUNI LAW GROUP, APC
245 FISCHER AVENUE, UNIT D1
COSTA MESA, CA 92626

KAZEROUNI LAW GROUP, APC
Abbas Kazerounian, Esq. (249203)
ak@kazlg.com
245 Fischer Avenue, Unit D1
Costa Mesa, CA 92626
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

RKR LEGAL, APC
Sina Rezvanpour, Esq. (274769)
sr@rkrlegal.com
Seyed Kazerouni, Esq. (272148)
mk@rkrlegal.com
245 Fischer Ave, Suite D1
Costa Mesa, California 92626
Telephone: (866) 502-0787
Facsimile: (866) 502-5065

HYDE & SWIGART
Joshua B. Swigart, Esq. (225557)
josh@westcoastlitigation.com
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108
Telephone: (619) 233-7770
Facsimile: (619) 297-1022

*Attorneys for Plaintiffs,
Heather McDonald, et al.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**HEATHER MCDONALD,
PAYMAN SHAHIN, ANGELA
THILL, GARY REMPEL, WENDY
MELLINE, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED.**

Case No.:

**Declaration of Payman Shahin in
Support of Venue for Class Action
Complaint Pursuant to Civil Code
Section 1780(c)**

Plaintiffs.

V.

EMMANUEL DAPIDRAN PACQUIAO; TOP RANK, INC.,

Defendants.

1 I Payman Shahin, declare under penalty of perjury as follows:

2 1. I make this declaration based upon my personal knowledge except as to those
3 matters stated herein that are based upon information and belief, which I
4 believe to be true. I am over the age of eighteen, a citizen of the State of
5 California, and am a named Plaintiff in the litigation described in the caption
6 page of this declaration.

7 2. This declaration is made pursuant to California Civil Code section 1780(c).

8 3. I reside in [City], California which is in the County of Orange.

9 4. The complaint filed concurrently with this declaration contains a cause of
10 action for violation of the Consumer Legal Remedies Act against the above
11 named Defendants which advertise, and sell the pay-per-view services at
12 issue in the complaint.

13 5. I purchased the pay-per-view for the Mayweather vs. Pacquiao fight (the
14 "Bout") on May 2, 2015, while located in [City], California, which is in the
15 Central District of California, on or about May 2, 2015. The Bout pay- per-
16 view I purchased is at issue in this complaint in this matter.

17 6. The transaction described above form a substantial portion of this action, and
18 occurred in the Central District of California and the County of Orange. To
19 the best of my knowledge, based upon information and belief, Defendants do
20 business in the Central District of California and Orange County, California,
21 and advertise and markets their products, including the products at issue in
22 this complaint, in the Central District of California and Orange County
23 California. Accordingly, this judicial district is a proper place for trial of
24 this action.

25 ///

26 ///

27 ///

28

1 I declare under penalty of perjury under the laws of California and the
2 United States of America that the foregoing is true and correct.
3
4

5 Executed this day of May 11, 2015 in [City], California.
6
7

8 
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Payman Shahin

KAZI SHAHINE LAW GROUP, APC
265 FISCHER AVENUE, UNIT B
COSTA MESA, CA 92626

KAZEROUNI LAW GROUP, APC
Abbas Kazerounian, Esq. (249203)
ak@kazlg.com
245 Fischer Avenue, Unit D1
Costa Mesa, CA 92626
Telephone: (800) 400-6808
Facsimile: (800) 520-5523

RKR LEGAL, APC
Sina Rezvanpour, Esq. (274769)
sr@rkrlegal.com
Seyed Kazerouni, Esq. (272148)
mk@rkrlegal.com
245 Fischer Ave, Suite D1
Costa Mesa, California 92626
Telephone: (866) 502-0787
Facsimile: (866) 502-5065

HYDE & SWIGART
Joshua B. Swigart, Esq. (225557)
josh@westcoastlitigation.com
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108
Telephone: (619) 233-7770
Facsimile: (619) 297-1022

*Attorneys for Plaintiffs,
Heather McDonald, et al.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

**HEATHER MCDONALD,
PAYMAN SHAHIN, ANGELA
THILL, GARY REMPEL, WENDY
MELLINE, INDIVIDUALLY AND
ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED.**

Case No.:

**Declaration of Angela Thill in Support of
Venue for Class Action Complaint
Pursuant to Civil Code Section 1780(c)**

Plaintiffs.

V.

EMMANUEL DAPIDRAN PACOUIAO: TOP RANK, INC..

Defendants.

1 I Angela Thill, declare under penalty of perjury as follows:

2 1. I make this declaration based upon my personal knowledge except as to those
3 matters stated herein that are based upon information and belief, which I
4 believe to be true. I am over the age of eighteen, a citizen of the State of
5 California, and am a named Plaintiff in the litigation described in the caption
6 page of this declaration.

7 2. This declaration is made pursuant to California Civil Code section 1780(c).

8 3. I reside in Oceanside, California which is in the County of San Diego.

9 4. The complaint filed concurrently with this declaration contains a cause of
10 action for violation of the Consumer Legal Remedies Act against the above
11 named Defendants which advertise, and sell the pay-per-view services at
12 issue in the complaint.

13 5. I purchased the pay-per-view for the Mayweather vs. Pacquiao fight (the
14 “Bout”) on May 2, 2015, while located in Oceanside, California, which is in
15 the Southern District of California, on or about May 2, 2015. The Bout
16 pay- per-view I purchased is at issue in this complaint in this matter.

17 6. The transaction described above form a substantial portion of this action, and
18 occurred in the Southern District of California and the County of San Diego.
19 To the best of my knowledge, based upon information and belief, Defendants
20 do business in the Southern District of California and San Diego County,
21 California, and advertise and markets their products, including the products at
22 issue in this complaint, in the Southern District of California and San Diego
23 County California. Accordingly, this judicial district is a proper place for
24 trial of this action.

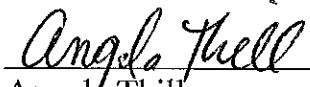
25 ///

26 ///

27 ///

1 I declare under penalty of perjury under the laws of California and the
2 United States of America that the foregoing is true and correct.
3
4

5 Executed this day of May 12, 2015 in Oceanside, California.
6
7

8 
9 Angela Thill
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

KAZEROUNI LAW GROUP, APC
245 FISCHER AVENUE, UNIT D1
COSTA MESA, CA 92626